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Summary of Public Comments on the Two South Delta Alternatives Developed by the SDIT on April 30, 1999

During the public meeting the features of the two alternatives were described, and comments solicited on each feature. Most of the comments were provided by Alex Hildebrand, Jerry Robinson, Rogene Reynolds. They are generally keyed to the summary table, Features of the South Delta Alternatives, rev. 4/30/99.

New Northern CCFB Intake and Fish Screens, 1-6: The new screened intake operations will exacerbate stage concerns in the south Delta region because pumping will continue around the clock, including during low tide periods. The additional permitted export capacity will also make this worse since stage impacts increase with diversion rate.

SWP Operations prior to completion of new intake and fish screens, 24g: A detailed operational analysis is needed to assure that ramping up exports above existing export levels does not impact local water availability.

SWP Operations after completion of new intake and fish screen and approval by the fish and wildlife agencies, 25-26: This language should be modified to indicate that an export rate of 10,300 cfs is accompanied by full implementation of the features which will protect local water users from the adverse effects of existing and increased exports by the SWP and CVP.

Agricultural and Wetland Diversion Screening, 27-29: Extending and screening local agricultural diversions will not address circulation and water quality problems.

Aquatic and Terrestrial Habitat Restoration Targets in the South Delta Region, 30: There is concern about the specific locations of ERP targeted lands as well as about reclamation district revenues for levee maintenance once land goes into public ownership. Italian slough levees are in public ownership and levees are not in good shape. Concerns about how ambitious ERP targets are, and impacts upon Delta farmers.

Water Quality, 47: It is not enough to target dissolved oxygen in the Stockton area with tratment and control measures. It is also necessary to control reverse flow in the San Joaquin River, which can be accomplished with the Head of Old River barrier A combination of hydraulic and treatment measures is needed. CALFED should refer back to the SWRC Water Quality Control Plan measures.

Consolidation and Extension of Agricultural Diversions as Appropriate, 51-54: Concern that this approach in Alternative 1 may not be economically or technically feasible, so the feature should be reworded to indicate that the concept would be studied and only implemented if found to be feasible. Concern that consolidated diversions may not be logistically feasible since farmers have diverse crop types and irrigation

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scheduling needs. Concern that larger diversions may entrain proportionately more fish than small ones because they set up a more intense and larger inflow velocity field. Fish may tend to avoid the existing unscreened pumps due to pump noise. Concern that consolidated diversions may have greater local and regional stage impacts than the existing diversions. Concern that assumptions about lossses at existing diversions are unverified by field studies, which should be conducted before calling for screening. The previous studies did not cover the critical time period of February through June; there is no objection to conducting those studies at the same locations as the previous studies were conducted.

Concern that with Alternative 1 a great deal of dredging will be required to accomplish water availability without barriers. There is also a concern with respect to levee stability after dredging is completed. (CALFED has not yet evaluated the change in geometry which might be required, but preliminary estimates indicate that over 2 million cubic yards would need to be dredged.) Concern that this is too much material to be disposed of locally to reinforce levees.

Dredging extensively in Alternative 1, from HOR downstream in Old River, Grant Line Canal, and Middle River will alter the flow split at HOR, resulting in less flow passing Stockton. This will exacerbate reverse flows, water quality, and fish passage problems for salmon migrating in this corridor.

Concern that this dredging will also result in lower stages on the mainstem San Joaquin River upstream of the HOR split, creating new stage problems for farmers up as far as Vernalis.

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San Joaquin River and Tributaries Management for Water Quality Standards within SDWA service area, 55-56: The proposed approach in the Single Barrier Alternative is impractical because reservoirs rarely spill in the region. Releasing water from tributary reservoirs for water quality simply reallocates the water over time, rather than increase flows. Unless you recirculate and thus use existing water more than once, purchase water from CVP or SWP exporters, or build additional Friant storage, this approach will not work. Land fallowing to make more water available for streamflow can only work if those who are selling water are the ones who fallow their land.

Head of Old River Fish Control Structure, 57-61: Alternative 1 calls for operating the HOR barrier alone, which creates water supply problems for the south Delta because the south-east portion of the SDWA area drains as soon as the barrier is closed, leaving water levels too low, especially at low tide. It will be necessary to dredge very extensively to get Old River to run backwards to diverters clear up to the Head of Old river when the HOR barrier is operating in spring and fall.

Fundamental concern that operation of HOR alone will drive farmers out of business.

Closure of the barrier on April 1 under Alternative 1 will be a problem since spring irrigation is underway in April. Prefer the coordinated installation of HOR and ag barriers at the same time to avoid water stage impacts.

It was noted that the HOR barrier trapped upmigrating adult salmon. Anecdotal description of salmon rushing through cut in HOR when it is removed. Move like sheep through the breach for the first half hour after opening barrier.

Concern about compatibility of HOR barrier and other barriers during flood events. The barrier and channel might need to extend onto existing ag land since part of the structure remains in river, even when opened to accommodate flood flows.

Flow Control Structures, 62-67: Alternative 1 was viewed as unacceptable because without barriers it would not be practical to manage stages, circulation, and water quality in the south Delta region. Alternative 2 has three options with respect to Grant Line Canal Barrier. Option A, no GLC barrier is unacceptable. For option B, how will farmers achieve adequate conditions prior to August 1? July and August are the peak irrigation periods. Option C, operation throughout the irrigation period is the best of the options presented, but must do an adequate job of maintaining minimum stages.

Additional Flood Control Concerns: Paradise cut needs to be improved to address regional flood concerns. The weir at the connection with the San Joaquin River needs to be lowered, Paradise cut needs to be cleared of brush and dredged downstream to Grant Line Canal, and some levee setbacks are needed to achieve a flow capacity of about 20,000 cfs.

Export Rates and Local Impacts: Will the SWP and CVP be prepared to cut back on exports whenever local water supply availability is impacted in the event these alternatives don't work?